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tions have been held valid, *e. g.*, *Aiken v. Western U. Tel. Co.*, 5 S. C. 358; in others, as in *Ellis v. American Tel. Co.*, *supra*, receiver has been treated as impliedly assenting to contract of which the conditions were integral part. But in many other states the receiver's remedy lies in tort, *New York, etc., Tel. Co. v. Dryburg*, 35 Pa. 298; *Webbe v. Western U. Tel. Co.*, 169 Ill. 610; and this is the general rule, *Crosswell on the Law Relating to Electricity*, s. 471, 472, in harmony with which the dissenting opinion of *Halsted v. Postal Tel. Co.*, *supra*, was rendered. See also, *Thompson on the Law of Electricity*, s. 427-430.

WILLS—HOLOGRAPHIC WILLS—CONSTRUCTION.—*CARROLL v. ADAMS, ET AL.*, 105 N. Y. SUPP. 967.—*Held*, where testatrix executed a holographic will, by which she divided her estate into three parts and gave the first to the children of her sister A, deceased, and the second to her sister D, deceased, the bequest of the second share did not fail because D was dead at the time the will was made, but such share passed to D's children.